

### **REMARKS**

Applicants respectfully request reconsideration of the present application. Claims 1-3, 9 and 20-30 are pending and have been amended. No new matter has been added.

Applicants reserve all rights with respect to the applicability of the Doctrine of Equivalents.

#### **The Objection regarding Title of Invention**

The Examiner objected that the title of invention is not descriptive. Without admitting the propriety of the non-descriptive title objection, Applicants have amended the title. Thus, Applicants respectfully submit that the objection has been overcome.

#### **Rejection Under 35 U.S.C. § 112**

The Examiner rejected claims 1-3, 9 and 20-30 under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. The Examiner also rejected claims 2, 9, 24 and 29 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention.

Claims 1-3, 9 and 20-30 have been amended accordingly. Thus, Applicants respectfully submit that the rejection under 35 U.S.C. § 112 has been overcome.

### **The Rejection Under 35 U.S.C. § 103**

The Examiner rejected independent claims 1, 21 and 26 under 35 U.S.C. § 103(a) based on U.S. Patent Publication No. 2001/0028404 of Fukuhara et al. (“Fukuhara”) in view of U.S. Patent No. 6,512,793 of Maeda (“Maeda”). Applicants respectfully disagree.

The image processing apparatus of claim 1 *converts* first code data sets of JPEG 2000 *into* second code data in conformity with Motion JPEG 2000. In particular, the image processing apparatus of claim 1 performs:

- (1) generating a new tile part header for the selected first code data set; and
- (2) providing a tile index for each of the tile part headers including the new tile part header.

Fukuhara fails to disclose or suggest any of these two operations of claim 1. Fukuhara was filed *before* Motion JPEG 2000 (JPEG 2000 Part-3) was standardized by the ISO in November 2001. (Par. [0009] of Fukuhara) On this background, Fukuhara discloses generating a JPEG 2000 bitstream *capable of readily coping with* Motion JPEG 2000, not *converting* a JPEG 2000 code data *into* Motion JPEG 2000 code data as recited in

claim 1. (Pars. [0009], [0011] and [0012]) Accordingly, Fukuhara does not alter existing components of JPEG 2000 bitstream or add a new component. Rather, Fukuhara exploits *vacant or undefined bits* in *existing components* to insert additional information: ‘encoding picture rate’ and ‘frame/field encoding mode information’ (First Embodiment), ‘the number of pictures’ (Second Embodiment), and ‘encoding condition’ (Third Embodiment).

By contrast, the header processing unit of claim 1 “change[s] a main header ... to a main header for the second code data, generate[s] a new tile part header ..., change[s] each of main headers ... to a tile part header; and provide[s] a tile index ....”

In addition, contrary to the Examiner’s assertion, Fourth Embodiment of Fukuhara does not discuss the code data of claim 1; it discusses **file formats** of JPEG 2000 and Motion JPEG 2000. The file formats, *i.e.*, JP2 and MJP2, is for encapsulating code data of JPEG 2000 and Motion JPEG 2000, respectively, and consist of a series of elements called “boxes.” (Figs. 8 & 9 of Fukuhara) “Signature Box” and “Header Box” are one of them and do not include any code data. (Only codestream boxes contain code data.) Thus, Fukuhara does not disclose or suggest the code sequence converting unit of claim 1.

Maeda does not fill the gap in Fukuhara. Maeda discloses integrating *objects* in an image. No part of Maeda discloses or suggests converting multiple code data sets of JPEG 2000 into code data of Motion JPEG 2000 as recited in claim 1.

Because neither Fukuhara nor Maeda nor a combination of Fukuhara and Maeda discloses or suggests the conversion of claim 1, Applicants respectfully submit that the rejection with respect to claim 1 in view of Fukuhara and Maeda has been overcome.

Claims 21 and 26 contain similar, but not identical, limitations compared to the limitations of claim 1. Therefore, at least for the reason stated above, Applicants respectfully submit that the rejection of claims 21 and 26 in view of Fukuhara and Maeda has been overcome.

Claims 2-3, 9, 20, 22-25 and 27-30 depend, directly or indirectly, from one of claims 1, 21 and 26, and thus, include the limitations set forth in their respective base claims. Therefore, at least for the reason discussed above, it is respectfully submitted that the rejection of claims 2-3, 9, 20, 22-25 and 27-30 in view of Fukuhara and Maeda has been overcome.

Applicants, therefore, respectfully submit that the applicable objection and rejections have been overcome.

Please charge any shortages and credit any overages to Deposit Account No.

02-2666. Any necessary extension of time for response not already requested is hereby requested. Please charge any corresponding fee to Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

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/Michael J. Mallie/  
Michael J. Mallie  
Reg. No. 36,591

1279 Oakmead Parkway  
Sunnyvale, California 94805-4040  
(408) 720-8300